

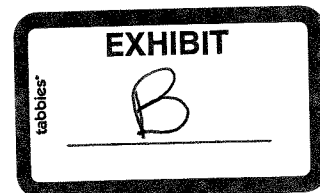
IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

LAWRENCE GLAZER, et al.)	CASE NO: 1:09 CV 1262
)	
Plaintiff)	JUDGE CHRISTOPHER A. BOYKO
)	
v.)	MAGISTRATE JUDGE GREG WHITE
)	
CHASE HOME FINANCE LLC, et al.)	
)	
Defendants)	
)	
)	
)	
)	

STATE OF OHIO)	
)	SS <u>AFFIDAVIT OF LORI E. BROWN, ESQ.</u>
COUNTY OF CUYAHOGA)	

Affiant, Lori E. Brown, Esq., being of sound, mind and body, having been first duly sworn under oath, according to law, deposes and states as follows:

1. I am an attorney licensed to practice law in the State of Ohio.
2. I am one of the attorneys of record for Reimer, Arnovitz, Cherek & Jeffrey Co., L.P.A., Darryl Gormley and Ronald Cherek ("the Reimer Firm") and understand this Affidavit is being used in support of the Reimer Firm's Reply in Support of Disqualification.
3. Attached hereto as Exhibit 1 to this Affidavit are documents, including correspondence and email that I received from Auto Owners Insurance Company. These documents are true and correct copies of documents received pursuant to a subpoena. The documents are Bates stamped FFA000025-31; 35-36; 44-47, 54; 206-208.
4. Attached hereto as Exhibit 2 are documents that were submitted by the Plaintiff for *in-camera* inspection and were produced by Plaintiff's counsel pursuant to Court Order. These documents are true and correct copies of the documents received from Plaintiff's counsel.

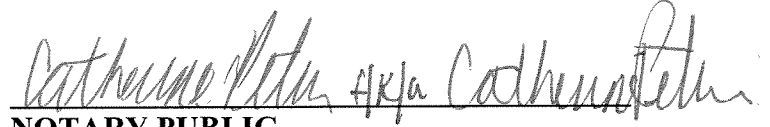


Further Affiant Sayeth Not.



LORI E. BROWN, ESQ.

SWORN TO BEFORE ME and subscribed in my presence, this ____ day of
July, 2015.



NOTARY PUBLIC

CATHERINE FAZIO, Atty.
NOTARY PUBLIC • STATE OF OHIO
My commission has no expiration date
Section 147.03 O.R.C.

AUTO-OWNERS INSURANCE COMPANY
AUTO-OWNERS LIFE INSURANCE COMPANY
HOME-OWNERS INSURANCE COMPANY
OWNERS INSURANCE COMPANY
PROPERTY-OWNERS INSURANCE COMPANY
SOUTHERN-OWNERS INSURANCE COMPANY

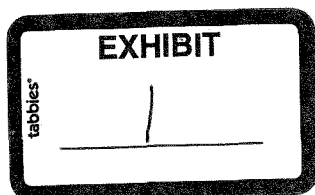


BRANCH CLAIM OFFICE
1105 Schrock Rd., Suite 105 • P.O.
Columbus, Ohio 43226-0
614-888-2866 FAX 614-888-
Toll Free: 888-841-647
WWW.AUTO-OWNERS.C

CLAIMS FAX TRANSMISSION

DATE: 4/10/09 Number of pages including
TO: FAX # () 310-407-5354
TO: NICOLETTE GLAZER
Attention: _____
FROM: **AUTO-OWNERS INSURANCE COMPANY**
BY: PETE SENBOS
SUBJECT: _____
Remarks: _____

The information contained in this facsimile message is intended only for the personal and confidential use of the des above. This message may be an attorney-client or work product communication and is privileged and confidential communication in error, please notify us immediately by telephone and return the original message to us by mail. distribution or copying of this message by any person other than the intended recipient(s) or their authorized agent. Thank you.



PLEASE CALL SENDER IF ANY PAGES ARE MISSING OR UNCLEAR

FFA000025

Sengos, Pete

From: Sengos, Pete
To: Nicolette Glazer
Cc:
Subject: RE: In Re Bristol Rd.
Attachments:

Sent: Fri 4/10/2009 9:2

Hello, What I meant is I thought there had already been insulation in the ceiling and that the ir from the roof leak. I thought you were getting an estimate to replace this insulation. If there w in the ceiling or the wall cavities for that matter, we wouldn't owe to install it. I will fax over a p

Pete Sengos
Auto-Owners Insurance Company
P.O. Box 26257
Columbus, OH 43226
PH: 614-888-2866 ext. 18
Fax: 614-888-5994

From: Nicolette Glazer [mailto:nicolette@glazerandglazer.com]
Sent: Thu 4/9/2009 8:23 PM
To: Sengos, Pete
Subject: RE: In Re Bristol Rd.

Dear Mr. Sengos:

thank you very much for your email. I was advised that roof insulation will be very difficult and likely ineffective property house as a solution. Wall insulation was more likely to be effective. However, if your position is that it i event, then please forward the release for the offer as stated in your email. As soon as I receive the papers I wi executed and returned to your office. Thank you.

Nicolette Glazer Esq.
Law Offices of Larry R Glazer
1875 Century Park East #700
Century City, CA 90067
Tel: (310) 407-5353
Fax: (310) 407-5354

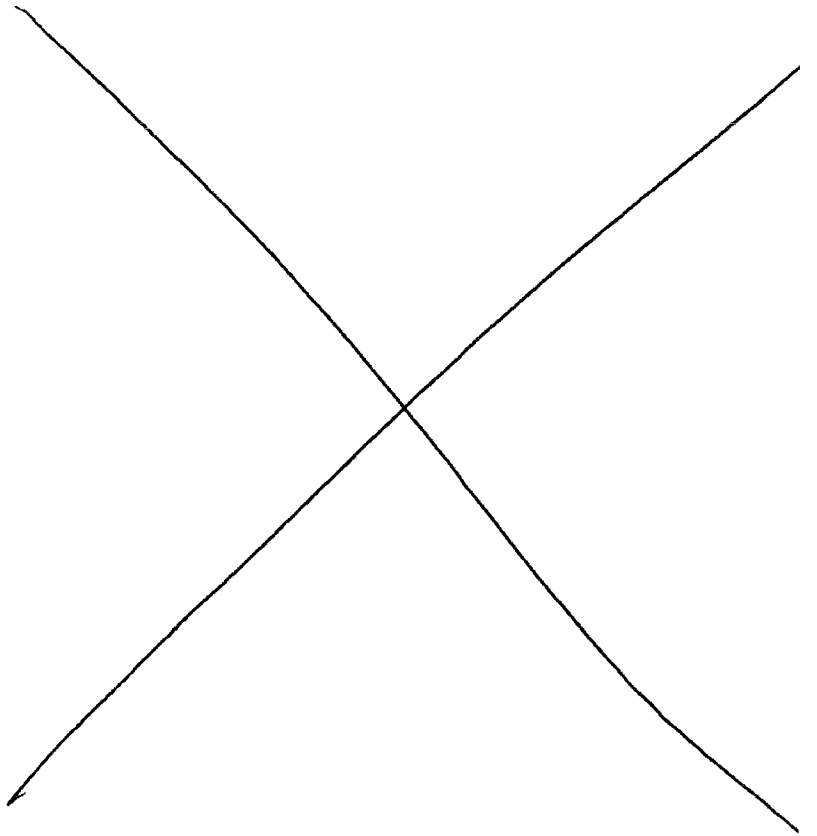
THIS MESSAGE ORIGINATED FROM THE LAW OFFICES OF LARRY R. GLAZER. THIS MESSAGE IS INTENDED OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVI CONFIDENTIAL, AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF THE READER OF THIS MESSAG INTENDED RECIPIENT, OR THE EMPLOYEE, OR THE AGENT RESPONSIBLE FOR DELIVERING THE MESSAGE TC RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION, OR COPYING OF THIS I STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR PLEASE NOTIFY US FROM THIS MESSAGE AND ANY ATTACHMENT IT MAY CONTAIN. THANK YOU

> Subject: RE: In Re Bristol Rd.
> Date: Mon, 6 Apr 2009 14:52:51 -0400
> From: Sengos.Pete@aoins.com
> To: nicolette@glazerandglazer.com
>
> Dear Ms. Glazer:
>
> I received all of your information. I thought the insulation bid was for ceiling insulation from the roof leak? I t the wall cavities. Since the walls did not have insulation to begin with, we could not pay for this service. We will other claims as follows:
>
> Able Roofing: \$500
> National Mold Remediation: \$4990

> Post remediation testing: \$650
>
> Please let me know if you agree and I can forward a release.
>
> Pete Sengos
> Auto-Owners Insurance Company
> P.O. Box 26257
> Columbus, OH 43226
> PH: 614-888-2866 ext. 18
> Fax: 614-888-5994
>
> _____
>
> From: Nicolette Glazer [mailto:nicolette@glazerandglazer.com]
> Sent: Mon 3/23/2009 8:21 AM
> To: Sengos, Pete
> Subject: Re: In Re Bristol Rd.
>
>
>
> Dear Mr. Sengos,
> I finally got the insulation quote it is for 1400 dollars. I will be able to scan the actual quote tomorrow. With the
> post remediation air and material tests this appears to be the last estimate/work needed for the loss. Thanks
> Sent from my Verizon Wireless BlackBerry
>
> -----Original Message-----
> From: Sengos Pete <Sengos.Pete@aoins.com>
>
> Date: Wed, 25 Feb 2009 18:01:34
> To: <nicolette@glazerandglazer.com>
> Subject: RE: In Re Bristol Rd.
>
>
> We'll extend another 30 days. Thank you
>
> Pete Sengos
> Auto-Owners Insurance Company
> P.O. Box 26257
> Columbus, OH 43226
> PH: 614-888-2866 ext. 18
> Fax: 614-888-5994
>
> _____
>
> From: Nicolette Glazer [mailto:nicolette@glazerandglazer.com <mailto:nicolette@glazerandglazer.com>]
> Sent: Wed 2/25/2009 12:56 PM
> To: Sengos, Pete
> Subject: Re: In Re Bristol Rd.
>
>
>
> Hi Mr Sengos,
> I am still awaiting insulation bids. I would greatly appreciate your extending the 27 Feb deadline for resubmission
> loss. Without the bids I have no way for providing a total claim number. Thanks. Nicolette Glazer
> -----Original Message-----
> From: Sengos Pete
> To: Nicolette
> Subject: RE: In Re Bristol Rd.
> Sent: Feb 10, 2009 6:01 AM
>
> Forward the insulation bids and we'll work something out.
>
> Pete Sengos
> Auto-Owners Insurance Company
> P.O. Box 26257

> Columbus, OH 43226
> PH: 614-888-2866 ext. 18
> Fax: 614-888-5994
>
>
> _____
>
> From: Nicolette Glazer [mailto:nicolette@glazerandglazer.com <mailto:nicolette@glazerandglazer.com>
<mailto:nicolette@glazerandglazer.com <mailto:nicolette@glazerandglazer.com%20%3Cmailto:nicolette@glaze
>]
> Sent: Wed 2/4/2009 2:47 PM
> To: Sengos, Pete
> Subject: In Re Bristol Rd.
>
>
> Dear Mr. Sengos:
>
> enclosed for your review are the following documents:
>
> 1. contract for roof repairs w/ Able Roofing. The repairs are supposed to be done today.
> 2. proposal from NM regarding clean up and mold removal (ceiling, walls, wood beams) and painting etc.
> 3. bid from ServPro for mold remediation
>
> Rich from Pureclean came to the house. I hope he was able to get in touch with you. I have not received a bi
waiting for two more bids in re insulation etc. I will forward them as soon as I receive them.
>
> thanks
>
> Nicolette Glazer
>
> Nicolette Glazer Esq.
> Law Offices of Larry R Glazer
> 1875 Century Park East #700
> Century City, CA 90067
> Tel: (310) 407-5353
> Fax: (310) 407-5354
>
> THIS MESSAGE ORIGINATED FROM THE LAW OFFICES OF LARRY R. GLAZER. THIS MESSAGE IS INTENDED I
OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PR
CONFIDENTIAL, AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF THE READER OF THIS MESSAG
INTENDED RECIPIENT, OR THE EMPLOYEE, OR THE AGENT RESPONSIBLE FOR DELIVERING THE MESSAGE TO
RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION, OR COPYING OF THIS M
STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR PLEASE NOTIFY US PROMI
THIS MESSAGE AND ANY ATTACHMENT IT MAY CONTAIN. THANK YOU
>
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> _____
>
> All-in-one security and maintenance for your PC. Get a free 90-day trial! Learn more!
<http://www.windowsonecare.com/purchase/trial.aspx?sc_cid=wl_wlmail <http://www.windowsonecare.com/purchase/trial.aspx?sc_cid=wl_wlmail> >
<http://www.windowsonecare.com/purchase/trial.aspx?sc_cid=wl_wlmail <http://www.windowsonecare.com/purchase/trial.aspx?sc_cid=wl_wlmail> >
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FFA000029

<https://webmail.aoins.com/exchange/E001377/Sent%20Items/RE:%20In%20Re%20Br>

Sengos, Pete

From: Sengos, Pete
To: Nicolette Glazer
Cc:
Subject: RE: In Re Bristol Rd.
Attachments:

Sent: Mon 4/6/2009 2:11 PM

Dear Ms. Glazer:

I received all of your information. I thought the insulation bid was for ceiling insulation from the walls. I didn't know it was for the wall cavities. Since the walls did not have insulation to begin with, we will agree to all your other claims as follows:

Able Roofing: \$500
National Mold Remediation: \$4990
Post remediation testing: \$650

Please let me know if you agree and I can forward a release.

Pete Sengos
Auto-Owners Insurance Company
P.O. Box 26257
Columbus, OH 43226
PH: 614-888-2866 ext. 18
Fax: 614-888-5994

From: Nicolette Glazer [mailto:nicolette@glazerandglazer.com]
Sent: Mon 3/23/2009 8:21 AM
To: Sengos, Pete
Subject: Re: In Re Bristol Rd.

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Sent from my Verizon Wireless BlackBerry

-----Original Message-----

From: Sengos, Pete <Sengos.Pete@aoins.com>

Date: Wed, 25 Feb 2009 18:01:34
To: <nicolette@glazerandglazer.com>
Subject: RE: In Re Bristol Rd.

We'll extend another 30 days. Thank you

Pete Sengos
Auto-Owners Insurance Company
P.O. Box 26257
Columbus, OH 43226
PH: 614-888-2866 ext. 18
Fax: 614-888-5994

FFA000030

<https://webmail.aoins.com/exchange/E001377/Sent%20Items/RE:%20In%20Re%20Br>

From: Nicolette Glazer [mailto:nicolette@glazerandglazer.com <mailto:nicolette@glazerandglazer.com>]
Sent: Wed 2/25/2009 12:56 PM
To: Sengos, Pete
Subject: Re: In Re Bristol Rd.

Hi Mr Sengos,

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Nicolette Glazer

-----Original Message-----

From: Sengos Pete
To: Nicolette
Subject: RE: In Re Bristol Rd.
Sent: Feb 10, 2009 6:01 AM

Forward the insulation bids and we'll work something out.

Pete Sengos
Auto-Owners Insurance Company
P.O. Box 26257
Columbus, OH 43226
PH: 614-888-2866 ext. 18
Fax: 614-888-5994

From: Nicolette Glazer [mailto:nicolette@glazerandglazer.com <mailto:nicolette@glazerandglazer.com>]
Sent: Wed 2/4/2009 2:47 PM
To: Sengos, Pete
Subject: In Re Bristol Rd.

Dear Mr. Sengos:

enclosed for your review are the following documents:

1. contract for roof repairs w/ Able Roofing. The repairs are supposed to be done today.
2. proposal from NM regarding clean up and mold removal (ceiling, walls, wood beams) and
3. bid from ServPro for mold remediation

Rich from Pureclean came to the house. I hope he was able to get in touch with you. I have bid from him. I am waiting for two more bids in re insulation etc. I will forward them as soon them.

thanks

Nicolette Glazer

Nicolette Glazer Esq.
Law Offices of Larry R Glazer
1875 Century Park East #700

FFA000031

<https://webmail.aoins.com/exchange/F001377/Sent%20Items/RE:%20In%20Re%20Br>

03/17/2009 01:03 3104075354

LARRY R GLAZER ESQ

Nicolette Glazer, Esq.

Law Office
1875 C

Century
Tel: 3
Fax: 3

nicolette@

Auto-Owners Insurance
1105 Schrock Rd., Suite 105
P.O. Box 26257
Columbus, OH 43226-0257

VIA FAX (614)-888-5994, USPS and e-mail

27 March 2008

**IN RE: SUBMISSION OF PROOF OF
DEMAND**

Claim No.: 12-3774-08

Claimant: Mr. Lawrence Glazer

The Estate Of Charles W.

Your Insured: Mr. Charles W. Klie, d

Nature of Claim: Property Damage c
Mold

Date of Loss: unknown

Dear Mr. Sengos:

Enclosed is the notarized proof of loss in the above identified matter enclosing the estimate for blowing insulation in the wall cavities in remedy the patent structural defect that caused the mold growth. previously submitted evidence Lawrence Glazer hereby makes a demand amount of \$7,040.00 as follows:

1. roof repairs by Able Roofing: \$500.00
2. mold remediation; clean up; and wall re-painting by National Remediation Inc.: \$4990.00
3. Insulation by Edwards/Money & Moses: \$1400.00
4. Post remediation mold testing (air and swab samples): \$600.00
5. Less deductible: \$500.00

03/17/2009 01:03 3104075354

LARRY R GLAZER ESQ

If you prefer that a particular company conduct the post remediation please let me know the identity of the entity selected so that I can make arrangements for inspection and testing to be done promptly.

Please do not hesitate to contact me at (310) 407-5353 or by e-mail at nicolette@glazerandglazer.com if you have any questions.

Sincerely,

Law Offices of Larry R Glazer

s/Nicolette Glazer
by Nicolette Glazer Esq.

NMR
National Mold Remediation

1/30/09

JOB: M9226

CLIENT: NICOLETTE GLAZER

LOCATION: 2498 BRISTOL RD.
UPPER ARLINGTON, OH 43221

Re: Scope and Cost of Mold Remediation

We are pleased to provide you with the following information for the mold remediation services per request required to complete the project.

The client contacted National Mold Remediation to inspect the residence at the above mentioned address for mold.

We arrived at the residence and the homeowner showed us around the structure. We noted visible mold throughout the kitchen, bath room, living room, 3 bedrooms and the hallway. Access holes were cut in the drywall to determine if there was any mold growing in the cavity behind the drywall. None was found. The roof is deemed as the source of moisture intrusion and we have been advised by the homeowner that this is being replaced by others.

We are quoting this project in 2 phases. Phase 1 was quoted for mold remediation, Phase 2 will be quoted for removal of cabinets and appliances and whole house painting.

FFA000044

2480 BANWICK RD.
COLUMBUS, OH 43232
614-231-6653 (MOLD) FAX 614-235-3992
WWW.NMRINCORPORATED.COM

OUR RECOMMENDATION FOR THIS PROJECT IS AS FOLLOWS:

ROOF

- The roof is to be replaced by others.

PHASE I

INTERIOR OF HOME

*Run air scrubbers during entire mold remediation process.

- HALLWAY

1. Remove drywall.
2. Treat studs with chemical fungicidal to kill mold.
3. Wire brush affected areas to remove mold.
4. HEPA vac all contaminated areas to remove remaining mold spores.
5. Follow with encapsulate treatment to prevent future mold growth in the area.
6. Re-hang drywall.
7. Clean up all debris.

- LIVING ROOM

1. Mold spots in ceiling to be removed.
2. Treat area with chemical fungicide to kill mold.
3. Wire brush affected areas to remove mold.
4. HEPA vac all contaminated areas to remove remaining mold spores.
5. Follow with encapsulate treatment to prevent future mold growth in the area.

future mold growth in the area.

6. Re-hang drywall that was removed.

7. Clean up all debris.

- LAUNDRY ROOM

1. Mold spots in ceiling to be removed.

2. Treat area with chemical fungicide to kill mold.

3. Wire brush affected areas to remove mold.

4. HEPA vac all contaminated areas to remove remaining mold spores.

5. Follow with encapsulate treatment to prevent future mold growth in the area.

6. Re-hang drywall that was removed.

7. Clean up all debris.

- BEDROOMS

1. Treat contaminated areas with chemical fungicide to kill mold.

2. Wire brush affected areas to remove mold.

3. HEPA vac all contaminated areas to remove remaining mold spores.

4. Follow with encapsulate treatment to prevent future mold growth in the area.

5. Clean up all debris.

- BATHROOM

1. Treat contaminated areas with chemical fungicide to kill mold.

2. Wire brush affected areas to remove mold.

3. HEPA vac all contaminated areas to remove remaining mold spores.

4. Follow with encapsulate treatment to prevent future mold growth in the area.

5. Clean up all debris.

Our price for the PHASE I as described above:

\$2189.87

NOTE: OUR QUOTATION FOR THE MOLD REMEDIATION FOR PROJECT IS FOR REMEDIATION OF ONLY WHAT WE HAVE BEEN TO SEE. IT MAY BE THAT THE MOLD HAS GROWN TO A MUCH AREA AND HAS AFFECTED OTHER STRUCTURAL ITEMS NOT PREVIOUSLY OBSERVED (i.e. STUDS THAT WOULD HAVE TO BE REPLACED). IF THE MOLD HAS DEVELOPED FURTHER, WE RESERVE THE RIGHT TO RE-EVALUATE OUR PRICES FOR THIS PROJECT. WE WILL NOT DO ANY EXTRA WORK THAT WOULD CAUSE YOU ANY MORE HARDSHIP WITHOUT YOUR WRITTEN APPROVAL.

PHASE II

INTERIOR OF HOME

- Remove cabinets and appliances and transport to Habitat for Humanity on behalf of homeowner.
- Paint interior of entire house

Our price for the PHASE II as described above:

\$2799.94

As a courtesy to our clients, we do not use vehicles with our name and do not display yard signs advertising our services.

If you have any questions, please contact the writer.

Lynn Edelman
National Mold Remediation

Sengos, Pete

From: Sengos, Pete **Sent:** Thu 1/22/2009 10:57 AM
To: Nicolette Glazer
Cc:
Subject: RE: In Re: CL 12-3774-08 (Bristol Rd. Property)
Attachments:

Go ahead and fax me what you have, I may be able to figure it out. You can also try Purocle; 5739

Pete Sengos
Auto-Owners Insurance Company
P.O. Box 26257
Columbus, OH 43226
PH: 614-888-2866 ext. 18
Fax: 614-888-5994

From: Nicolette Glazer [mailto:nicolette@glazerandglazer.com]
Sent: Thu 1/22/2009 8:26 AM
To: Sengos, Pete
Subject: Re: In Re: CL 12-3774-08 (Bristol Rd. Property)

I have an estimate for the roof repair from Abble Roofing for 500 dollars. I will be metting wil do have an estimate for clean up of the mold caused by the roof and in the bedrooms for 250 removal of damaged dry wall and clean up). I have tried unsucessfully to obtain an itimization the two separate area and an estimate for putting back the dry wall from servepro but they a uncooperative on the issue and I will not use their services. I do not have an estimate for rep up of the wood beams on the ceiling. Do you have a mold remediation company that you would remediation in the laundry room and hallway (the damage caused by the roof). I would app order to obtain an estimate from them. Thanks Nicolette Glazer
Sent from my Verizon Wireless BlackBerry

-----Original Message-----

From: Sengos Pete <Sengos.Pete@aoins.com>

Date: Wed, 7 Jan 2009 15:03:05
To: <nicolette@glazerandglazer.com>
Subject: RE: In Re: CL 12-3774-08 (Bristol Rd. Property)

Nicolette:

I received the proof of loss but have to reject same, as it does not indicate a dollar amount f damages. Please email me your estimates and we'll try to work out an agreed price. Thanks

Pete Sengos
Auto-Owners Insurance Company
P.O. Box 26257
Columbus, OH 43226
PH: 614-888-2866 ext. 18
Fax: 614-888-5994

09/12/08 FRI 22:28 FAX 3104075354

Larry Glazer, Esq.

Nicolette Glazer, Esq.

DOCUMENT IMAGED AS RECEIVED

Law Office
1875 C

Century
Tel: 3
Fax: 3

nicollette@

Auto-Owners Insurance
1105 Schrock Rd., Suite 105
P.O. Box 26257
Columbus, OH 43226-0257

VIA FAX (614)-888-5994, USPS and e-mail

12 September 2008

IN RE: ATTORNEY'S ENTRY OF APPEAL

Claim No.: 12-3774-08

Claimant: Mr. Lawrence Glazer

The Estate Of Charles W

Your Insured: Mr. Charles W. Klie,

Nature of Claim: Property Damage
Mold

Date of Loss: unknown

Dear Mr. Sengos:

Please take notice that the undersigned, in her capacity as legal representative for Mr. Lawrence R. Glazer, the claimant identified above, hereby enters as attorney of record in this matter. Please direct all further correspondence regarding Mr. Glazer's pending claim to my attention.

I am in receipt of your 10 September 2008 correspondence as well as your August 2008 correspondence sent to Ms. Deborah L. Klie, Co-Administrator of the Estate of Charles W. Klie.

As you are aware, the property at 2498 Bristol Road, Upper Arlington, Ohio, has been distributed to Mr. Glazer in the course of the administration of the estate of Charles W. Klie; accordingly, Mr. Glazer is the beneficiary and owner of the property.

Based on my visual observations of the property it appears that there are at least three areas that show a clear presence of mold: (1) the north

09/12/08 FRI 22:29 FAX 3104075354

Larry Glazer, Esq.

Pete Sengos Letter
12 September 2008
page 2

DOCUMENT IMAGED

bedroom has visible mold growth on the northern wall in the closet joint starting at about 15cm above the floor; (2) the south-east wall has visible mold growth on the entire south wall of the closet starting 15cm from the floor up to the ceiling; and (3) the bathroom appears to have mold around the tub and in the grout on the wall adjoining the affected bedroom.

Based on my observations of the mold growth significantly above the foundation, absent a proper investigation into the source of moisture (e.g., opening of the wall to trace the source of moisture, moisture meter testing, etc.) I cannot concur with your conclusion that "the mold is the result from water entering through the walls or foundation of the house and/or inadequate drainage around the foundation." See 20 Aug 2008 letter. There are no visible traces of water intrusion from outside or through the foundation. In fact, the location of the growth seems to indicate a different source of moisture, perhaps from the roof and/or the pipe joint in the bedroom, both of which are covered events.

I appreciate your willingness to continue to investigate the source of moisture at the subject property and would like to advise you that the administrators of the Estate are anticipating that they will be able to complete the removal of the tangible property subject to the probate administration in the next 30 days of the property by 25 September 2008. In order to expeditiously handle this matter, however, I believe it will be best if the EES Group begins their investigation of the property as soon as possible by conducting any visual inspection and moisture testing they deem necessary. I will coordinate with Ms. Lexa Herndon to provide prompt access to the property. Once this preliminary investigation is completed and the administrators have been able to remove the property from the premises EES Group will be able to have unlimited access to the affected portions to conduct any destructive testing they deem necessary including the opening of the inner walls. I do believe it will be necessary to have proper containment in the hallway to prevent cross contamination and to have release in the front part of the house.

Also, I would like to advise you that once the walls have been opened and the EES Group has completed their investigation we intend to send a certified investigator and industrial hygienist to take air and topical samples and to conduct any inspections they deem necessary prior to your closing. Accordingly, I would appreciate your providing me with at least 30 days of access following the completion of your entire investigation to coordinate access to the property.

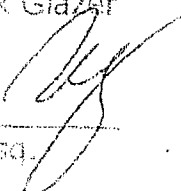
DOCUMENT IMAG

Pete Sengos Letter
12 September 2008
page 3

Please do not hesitate to contact me at (310) 407-5353 or by e-
nicollette@glazeradnoglazer.com if you have any questions.

Sincerely,

Law Offices of Larry R. Glazer


____s/Nicolette Glazer
by Nicolette Glazer Esq.

MEANS, BICHIMER, BURKHOLDER & BAKER

OWEN H. MEANS
ROBERT M. MORROW
RICHARD W. ROSS
DENNIS J. MORRISON
NICOLE M. DONOVSKY
LISA THOMAS BANAI
JESSIE L. MADISON
JENNIFER L. DONOVSKY
JONATHAN M. MILLER
KAROL LEWITTER, N. LEWIS

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RETIRED

June 23, 2008

Law Offices of Larry R. Glazer
Attn: Nicolette Glazer
1875 Century Park East #700
Century City, CA 90067

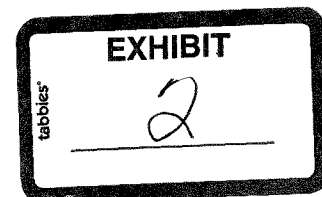
Re: Estate of Charles W. Klie

Dear Ms. Glazer:

Our office is in receipt of your letter of June 22, 2008. In response to certain issues raised in your letter, it is true that Deborah Klie and Susan Klie have been appointed as fiduciaries of the above estate. Due to the fact that the decedent had not updated his Will for close to 20 years, there were various problems and difficulties encountered in trying to get fiduciaries appointed in this particular case. The only documents that have been filed to date are the documents referenced in your letter although we anticipate that we will be filing an Inventory and a Schedule of Assets of the estate later this week. We are forwarding copies of all filings made as of this date by regular mail. We will be providing copies of the Inventory and Schedule of Assets to all beneficiaries once they are filed.

Due to the fact that there was more than a two month delay in getting our clients appointed, the mortgage obviously fell into default. For several weeks after the administrators were appointed, there were no readily available funds that were available to pay the mortgage. We have been in contact with the attorney who is now representing Chase in an effort to try and reinstate the loan. We will keep you advised of that progress and in the event that we have not been able to reinstate the loan before the answer deadline on the foreclosure case, we anticipated that we would either file a general answer on behalf of all named defendants including potential beneficiaries of the estate or we would request an extension of 30 days to file a pleading while we try and get the loan reinstated and the case dismissed.

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June 23, 2008

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In regard to any correspondence between our office and third parties, we would certainly need to exert a privilege under the attorney client privilege doctrine unless and until our clients would waive such privilege.

Perhaps one final comment is in order. Susan Maney O'Leary was named in the original Will as the beneficiary of this particular property. If she had not disclaimed her interest, our plan was to distribute the property outright to her subject to the mortgage. Therefore, if she had not disclaimed the property, she would have taken the property subject to the mortgage and any resulting payment obligations thereunder. We did not want the estate to incur mortgage related expenses that would have reduced the distribution to residuary beneficiaries if the property would have passed directly to her under the Will. As a result of the disclaimer, the residuary beneficiaries, one of which is your client, are now going to be entitled to receive whatever value this property has. Therefore, by obtaining a disclaimer from Susan Maney O'Leary, we believe that we have certainly enhanced your client's interest in this estate as opposed to your allegations that we have caused damage to his interest.

Once we have filed the Inventory, we should be in a position to either transfer the property subject to the mortgage or to distribute proceeds to the individuals as part of the residuary estate if the property is sold as part of the probate proceedings.

Sincerely,

MEANS, BICHIMER, BURKHOLDER & BAKER CO., L.P.A.



Robert M. Morrow

RMM/tah

Enclosures

Cc: Deborah Klie
Susan Klie

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Law Offices of Larry R. Glazer

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FACSIMILE TRANSMISSION

DATE: 22 June 2008

DATE 22 June 2008
TO Robert M Morrow Esq.
FAX# 614-485-2015
FROM Nicolee Glazer Esq.
FILE NAME In Re: Estate of Charles X FILE
FILE# 527992

TOTAL NUMBER OF PAGES BEING SENT INCLUDING COVER PAGE 3

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MEANS BICHIMER BURKHOLDER
& BAKER CO., L.P.A.
Attn: Mr. Robert M Morrow
2006 Kenny Rd.
Columbus, OH 43221-3502

22 June 2008

VIA FAX (614) 485-2010 and USPS

IN RE: Estate of Charles W Klie
Case no. 527992
CHASE HOME FINANCE LLC v. Robert Klie III et al.
Case no. 08CV008151

Dear Mr. Morrow:

This correspondence concerns the filing of a foreclosure action by CHASE HOME FINANCE LLC (Case no. 08 CV 008151) on 5 June 2008 naming Lawrence Glazer as a defendant.

A review of the Franklin County Probate Court online system shows that on 31 March 2008, as the attorney of record for the co-fiduciaries Ms. Deborah Klie and Ms. Susan Klie, you filed a petition to admit to probate Charles W. Klie's 6 April 1988 will and a concurrent petition for authority to administer the estate. On 1 April 2008 the Court entered an order appointing the co-fiduciaries and issuing letters of authority in this matter.

On or before 6 May 2008 your office received and subsequently filed a Disclaimer of Succession to Property signed by Ms. Susan Maney O'Leary.

Mr. Glazer, though a beneficiary of the residuary estate, was never served with copies of said filings; accordingly, I am not privy to the contents of the filings and thus have not been able to confirm the accuracy of the on-line entries listed above.

It now appears that the real property located at 2498 Bristol Rd., Upper Arlington, OH 43221 may be part of the residuary estate of which Mr. Glazer is a named beneficiary.

To date Mr. Glazer has not been advised of the financial affairs of the estate. He was never advised of the estate's insolvency and inability to keep current with mortgage payments; or, even worse, your clients' simple failure to make mortgage payments while under your watch. Had Mr. Glazer been so advised he would have readily loaned the estate money, or made payments on the estate's behalf, in order to prevent asset waste and damages.

Two months after the unfortunate and untimely death of Charles W. Klie you entered an appearance as attorney of record for the fiduciaries of his estate. You then allowed the

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fiduciaries to default on the mortgage without cause, thereby precipitating the filing of a foreclosure action naming Mr. Glazer as a defendant.

Your actions have already caused significant damages to the estate and to the named beneficiaries, including but not limited to pecuniary and non-pecuniary damages, loss of reputation, anguish, and emotional distress.

The due date for the responsive pleading in the foreclosure action is fast approaching; accordingly, you have seven days to provide me with copies of all correspondence you and your clients have received from Chase Home Financing LLC/Chase Bank USA regarding said property; all filings by your office in the administration of the estate; and all correspondence with third parties concerning the administration of the estate.

You are hereby notified that Mr. Glazer considers your interests in these matters to be adverse to his as a beneficiary of the estate and will proceed accordingly.

Please notify me promptly if you do not intend to honor my request for production of documents by 29 June 2008 or if you will assert a claim of privilege so that I may act accordingly.

Please do not hesitate to contact me at 310-407-5353 or via e-mail at nicolette@glazerandglazer.com if you need any further information.

Sincerely,

Law Offices of Larry R Glazer



by Nicolette Glazer Esq.

Cc: LRG

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